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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

THE ESTATE OF STEPHEN ROMNEY
SWENSEN, and CREW CAPITAL
GROUP, LLC, a Nevada limited liability
company,

Defendants,

WENDY SWENSEN, an individual,
SARIA C. RODRIGUEZ, an individual,
WS FAMILY IP, LLC, a Utah limited
liability company, WINGMAN, LLC, a
Utah limited liability company, and
SWENSEN CAPITAL, LLC, a Utah limited
liability company,

Relief Defendants.

**RECEIVER CHAD PEHRSONS' MOTION
FOR ORDER AUTHORIZING RECEIVER
TO EMPLOY CVO CPA AND ADVISORS
AS FORENSIC ACCOUNTANT**

Case No.: 1:22-cv-00135-RJS-DBP

Judge: Hon. Robert J. Shelby

Magistrate Judge: Dustin B. Pead

Chad S. Pehrson, the Court-Appointed Receiver (the “**Receiver**”) of the Estate of
Stephen Romney Swensen; Crew Capital Group, LLC; Wingman LLC; WS Family IP, LLC; and

Swensen Capital, LLC (collectively, the “**Receivership Defendants**”), hereby requests that the Court authorize him to engage the accounting firm of CVO CPA and Advisors (“**CVO**”) to perform accounting and investigate services. In support hereof, the Receiver states as follows:

1. On August 8, 2023, the Court entered the Order Appointing Receiver (“**Receivership Order**”) [Docket No. 38]. Paragraph 6(f) of the Receivership Order authorizes the Receiver to employ “accountants” to assist in the administration of the receivership.
2. The Receiver requests by this Motion an Order authorizing him to engage CVO to assist in performing his duties on behalf of the receivership estate.
3. CVO employs highly credentialed consultants. The hourly rates for its consultants and professionals range from \$75-\$250, depending on experience. Troy Hooton (“**Mr. Hooton**”) will be significantly involved with all work performed. Mr. Hooton’s CV is attached hereto as **Exhibit A**.
4. The Receiver anticipates cooperating closely with CVO to achieve efficient and effective progress on the tasks assigned under the Receivership Order.
5. CVO understands that its employment and compensation are subject to Court approval, and that its compensation must be allowable under applicable law. CVO also understands that compensation will be overseen by the Court pursuant to the Receivership order, which among other things, requires the filing of fee requests with the Court.

DATED: December 12, 2024

KUNZLER BEAN & ADAMSON, PC

/s/Taylor J. Hadfield
Taylor J. Hadfield
R. Jeremy Adamson

Attorneys for Receiver

CERTIFICATE OF SERVICE

I hereby certify that on December 12, 2024, I caused a true and correct copy of the foregoing document to be served via CM/ECF on all counsel of record in this litigation.

/s/Taylor J. Hadfield